

**JENNER & BLOCK LLP**

Vincent E. Lazar  
353 N. Clark Street  
Chicago, IL 60654  
Tel: (312) 923-2989  
vlazar@jenner.com

Marc B. Hankin  
919 Third Avenue  
New York, NY 10022  
Tel: (212) 891-1647  
mhankin@jenner.com

*Counsel for Electrolux North America, Inc., Electrolux  
Home Products, Inc., Electrolux Home Care Products,  
Inc. and Electrolux Puerto Rico, Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*

Debtors.<sup>1</sup>

Chapter 11

No. 18-23538 (RDD)

(Jointly Administered)

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

**NOTICE OF RECLAMATION CLAIM**

**PLEASE TAKE NOTICE** that Electrolux North America, Inc., Electrolux Home Products, Inc., Electrolux Home Care Products, Inc. and Electrolux Puerto Rico, Inc. (collectively, “Electrolux”), by and through their undersigned counsel, files this Notice of Reclamation Claim pursuant to 11 U.S.C. § 546(c), section 2-702 of the Uniform Commercial Code, and other applicable non-bankruptcy law, in the bankruptcy cases of the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) to reclaim certain goods (the “Goods”).

The Goods were sold by Electrolux in the ordinary course of business and delivered to the Debtors in the forty-five (45) days prior to the commencement of the Debtors’ bankruptcy proceedings on October 15, 2018 (the “Petition Date”). Electrolux is informed and believes that the Debtors were insolvent at the time they received delivery of the Goods. Electrolux incorporates by reference, and attaches as Exhibit A, copies of the written demands for reclamation (the “Reclamation Demands”) that previously have been served upon the Debtors.

**PLEASE TAKE FURTHER NOTICE** that Electrolux reserves all of its rights with respect to the Goods, including, without limitation, (i) its right to be paid in the ordinary course of business as a post-petition creditor of the Debtors to the extent the Goods were delivered to the Debtors on or after October 15, 2018; (ii) its right to assert an administrative priority claim pursuant to 11 U.S.C. § 503(b)(9); (iii) its right to assert a “new value” defense to any preference demand pursuant to 11 U.S.C. § 547(c)(4); (iv) its right to demand payment of these invoices, or any portion thereof, as cure payments in connection with the Debtors’ assumption of any executory contract, if any, pursuant to 11 U.S.C. § 365; (v) its right to seek payment of its prepetition invoices from any non-debtor parties that are co-obligors or otherwise liable for their payment; (vi) its right to file additional demands or claims, including without limitation, a proof of claim; and (vii) its

right to assert any other rights under applicable law. By filing this Notice, Electrolux does not consent to entry of final orders of the bankruptcy court on non-core issue and claims, does not waive any jurisdictional defenses, and reserves its rights to amend this Notice.

Dated: November 1, 2018

Respectfully submitted,

**JENNER & BLOCK LLP**

By: /s/ Vincent E. Lazar  
Vincent E. Lazar  
353 N. Clark Street  
Chicago, IL 60654  
(312) 923-2989  
[vlazar@jenner.com](mailto:vlazar@jenner.com)

Marc B. Hankin  
919 Third Avenue  
New York, NY 10022  
(212) 891-1647  
[mhankin@jenner.com](mailto:mhankin@jenner.com)

*Counsel for Electrolux North America, Inc.,  
Electrolux Home Products, Inc., Electrolux  
Home Care Products, Inc. and Electrolux  
Puerto Rico, Inc.*